

# EXHIBIT 16

1 UNITED STATES DISTRICT COURT

2 WESTERN DISTRICT OF NEW YORK

3 -----  
4 **BLACK LOVE RESISTS IN THE RUST, ET AL.,**  
5 **INDIVIDUALLY AND ON BEHALF OF A CLASS OF**  
6 **ALL OTHERS SIMILARLY SITUATED,**

7 Plaintiffs,

8 -vs-

1:18-cv-00719-CCR

9 **CITY OF BUFFALO, N.Y., ET AL.,**

10 Defendants.  
11 -----

12 **CONTINUED EXAMINATION BEFORE TRIAL**

13 **OF BYRON LOCKWOOD**

14 **APPEARING REMOTELY FROM**

15 **BUFFALO, NEW YORK**

16  
17 August 17, 2023

18 At 1:00 p.m.

19 Pursuant to notice

20  
21 REPORTED BY:

22 Rebecca L. DiBello, RPR, CSR(NY)

23 APPEARING REMOTELY FROM ERIE COUNTY, NEW YORK

**DEPAOLO CROSBY REPORTING SERVICES, INC.**

135 Delaware Avenue, Suite 301, Buffalo, New York 14202  
716-853-5544

**R E M O T E   A P P E A R A N C E S**

APPEARING FOR THE PLAINTIFFS, BLACK LOVE  
RESISTS IN THE RUST, ET AL., INDIVIDUALLY AND  
ON BEHALF OF A CLASS OF ALL OTHERS SIMILARLY  
SITUATED:

**NATIONAL CENTER FOR LAW AND  
ECONOMIC JUSTICE**

**BY: CLAUDIA WILNER, ESQ.**

275 Seventh Avenue, Suite 1506  
New York, New York 10001  
(212) 633-6967

APPEARING FOR THE DEFENDANTS, **CITY OF BUFFALO,  
N.Y., et al.:**

**HODGSON RUSS LLP**

**BY: PETER SAHASRABUDHE, ESQ.**

**And HUGH RUSS, ESQ.,**

140 Pearl Street  
Buffalo, New York 14202  
(716) 848-1508

ALSO PRESENT: Cheyenne Freeley, Hodgson Russ  
Anjana Malhotra

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1 MR. SAHASRABUDHE: Form.

2 A. If there was a change to that policy I'm quite  
3 sure it would have been mentioned to me. I  
4 just don't remember there being a change.

5 Q. In May of 2020 you also decided to eliminate  
6 the Housing Unit, right?

7 MR. SAHASRABUDHE: Form.

8 A. Yes. The Housing Unit was eliminated.

9 Q. And was that your decision or a decision of  
10 the BMHA?

11 A. I think it was a mutual decision with the City  
12 and the BMHA.

13 Q. And why was the Housing Unit eliminated?

14 MR. SAHASRABUDHE: Form.

15 A. There were -- the Housing Unit -- BMHA was  
16 paying the City I want to say 600 some  
17 thousand. I'm not sure of the exact amount  
18 and it became -- it was -- I guess it was time  
19 to renew that contract and from what it was  
20 costing the city to pay the officers was much  
21 more than what was being paid to the City and  
22 then there was also citizens that wanted their  
23 own patrol.

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1                   They didn't want police patrolling BMHA.  
2                   So that was a discussion with the City and  
3                   BMHA and I guess the contract just wasn't  
4                   renewed, so when it wasn't renewed we  
5                   disbanded the unit.

6           Q. Did anything replace the Housing Unit?

7                   MR. SAHASRABUDHE: Objection to form.

8           A. They came up -- yes. They came up with an  
9                   idea of each district will have a community  
10                  police officer assigned to the housing complex  
11                  unit.

12          Q. And what was the job responsibility of the  
13                  community policing officer?

14          A. The job was to do community policing in the  
15                  housing complex to assist citizens to work  
16                  with the children, to help setup programs over  
17                  there and also attend the meetings.

18          Q. Did the job of the community policing officer  
19                  include traffic enforcement around the BMHA  
20                  building?

21                  MR. SAHASRABUDHE: Form.

22          A. If there was a traffic violation then their  
23                  job was to enforce the traffic violation, yes.

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